

REMARKS/ARGUMENTS

1.) Claim Rejections – 35 U.S.C. § 102(e)

The Examiner rejected claims 1-11 under 35 U.S.C. § 102(e) as being anticipated by Irvin (WO 99/44380). The Applicant respectfully traverses the rejection. The Examiner cites page 9, line 19 to page 10, line 16 for disclosing the following elements:

wherein the stored reference voice tags comprise profile data correlated to different operating modes; and whereupon the selection of a certain operating mode of the electronic device, *the device controller is adapted to transfer to the sub-module memory a subset of the reference voice tags from the library of stored reference voice tags in accordance with the operating mode selected.*

But neither the cited passage of Irvin, nor the Irvin reference in general, disclose these elements of the present invention. Irvin discloses reference signatures associated with pointers to memory locations of an operational profile. The operational profile includes a variety of profile parameters. Presumably, the Examiner is equating the different operating modes of the present invention to the profile parameters of Irvin. However, nowhere in Irvin is there discussed the further element of a device controller adapted to transfer to *a sub-module memory* a subset of the reference voice tags from the library of stored reference voice tags in accordance with the operating mode selected. This particular feature is discussed in the present application at page 4, lines 2-14 and seen in Figure 4, elements 61A, 61B and 61C, and its advantages discussed at page 4, lines 25-30.

Similarly, with respect to claim 2, Irvin, at element 24c, Fig.2 and page 9, lines 11-18, does not disclose reference voice tags (presumably equated by the Examiner to reference signatures) being transferred to and *stored in groups* in the DSP memory, each of which relates to a specific operating mode of the device. Rather, the cited element/Figure/passages merely refer to storing in a general, undifferentiated, non-volatile memory (24c). It is the group storage in DSP memory that relates to a specific operating mode of the device that is a significant, distinguishing feature of the present invention. As noted above, this particular feature is discussed in the present application

at page 4, lines 2-14 and seen in Figure 4, elements 61A, 61B and 61C, and its advantages discussed at page 4, lines 25-30.

As such, Irvin does not identically disclose all of the elements of claims 1 or 2 of the present invention. Claims 3-5 depend from claims 1 or 2 and recite further limitations in combination with the novel elements of claims 1 or 2. Claims 9-11 depend from claim 1 and recite further limitations in combination with the novel elements of claim 1. Therefore, the allowance of claims 1-5 and 9-11 is respectfully requested.

With respect to claim 6, Irvin, at element 24c, Fig.2 and page 9, lines 11-18, does not disclose storing reference voice tags *in groups* in a main memory. Rather, the cited element/Figure/passages merely refer to storing in a general, undifferentiated, non-volatile memory (24c). It is the group storage in memory that relates to a specific operating mode of the device that distinguishes it from the cited reference. As such, Irvin does not identically disclose all of the elements of claim 6 of the present invention. Claims 7-8 depend from claim 6 and recite further limitations in combination with the novel elements of claim 6. Therefore, the allowance of claims 6-8 is respectfully requested.

2.) Claim Rejections – 35 U.S.C. § 103(a)

The Examiner rejected claims 10-11 under 35 U.S.C. § 103(a) as being unpatentable over Irvin in view of Finke-Anlauff (US 5,479,476). As noted, Irvin fails to identically disclose all of the elements of claim 1, from which claims 10 and 11 indirectly depend. Further, Finke-Anlauff fails to remedy to deficiencies of Irvin. Therefore, the allowance of claims 10-11 is respectfully requested.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

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Respectfully submitted,



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